

No. 20-1233

IN THE
Supreme Court of the United States

JOHNNY GATEWOOD,
Petitioner,
v.
UNITED STATES OF AMERICA,
Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Mark W. Mosier, a member of the Bar of this Court, certify that the Brief for *Amici Curiae* The Center on the Administration of Criminal Law at NYU School of Law and Kentucky Association of Criminal Defense Lawyers in Support of Petitioner in the above-captioned case contains 4,182 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

April 7, 2021

s/ Mark W. Mosier
Mark W. Mosier
COVINGTON & BURLING LLP
850 Tenth Street, NW
Washington, DC 20001
(202) 662-6000
mmosier@cov.com

Counsel of Record for *Amici Curiae*